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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY DEFAULT
ON DEBTOR'S MOTION PURSUANT TO FED. R.
BANKR. P. 4001(d) TO APPROVE STIPULATION
BETWEEN DEBTOR PACIFIC GAS AND
ELECTRIC COMPANY AND KATHLEEN
PELLEY AND ALLAN PELLEY REGARDING
MODIFICATION OF AUTOMATIC STAY**

[Re: Dkt No. 3874]

Objection Deadline: October 2, 2019
4:00 p.m. (Pacific Time)

**No hearing requested absent timely objection. If
timely objection is filed, hearing reserved for:**

Date: October 22, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Debtor’s Motion Pursuant to Fed.*
9 *R. Bankr. P. 4001(d) to Approve Stipulation Between Debtor Pacific Gas and Electric Company and*
10 *Kathleen Pelley and Allan Pelley Regarding Modification of Automatic Stay* [Dkt. No. 3874] (the
11 “**Motion**”).

12 **RELIEF REQUESTED IN THE MOTION**

13 The Motion seeks an order approving an agreement between the Utility and Kathleen
14 Pelley and Allan Pelley as embodied in the *Stipulation Between Debtor and Kathleen Pelley and Allan*
15 *Pelley Regarding Modification of the Automatic Stay* (the “**Stipulation**”), which was attached to the
16 Motion as **Exhibit A**. A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the
17 Motion.

18 **NOTICE AND SERVICE**

19 A *Notice of Opportunity for Hearing on Debtor’s Motion Pursuant to Fed. R. Bankr. P.*
20 *4001(d) to Approve Stipulation Between Debtor Pacific Gas and Electric Company and Kathleen Pelley*
21 *and Allan Pelley Regarding Modification of Automatic Stay* was filed concurrently with the Motion on
22 September 11, 2019 [Dkt. No. 3879] (the “**Notice of Opportunity for Hearing**”). The Motion, the
23 supporting declarations of Jana Contreras [Dkt. No. 3875] and Joseph Echols [Dkt. No. 3876], and the
24 Notice of Opportunity for Hearing were served as described in the Certificate of Service of Jamie B.
25 Herszaft, filed on September 16, 2019 [Dkt. No. 3896].

26 The deadline to file responses or oppositions to the Motion has passed, and no oppositions
27 have been filed with the Court or received by counsel for the Debtors.
28

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller & Benvenutti LLP, co-counsel for the Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: October 3, 2019

**WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP**

/s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession